

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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Robert Ward, <i>on his own behalf and on behalf of all others similarly situated,</i>	:	Civil Action No.: 2:17-cv-02069-MMB
	:	
Plaintiff,	:	
v.	:	
Flagship Credit Acceptance LLC,	:	
	:	
Defendant	:	
	:	

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**SUPPLEMENTAL DECLARATION OF SERGEI LEMBERG**

I, Sergei Lemberg, under penalty of perjury under the laws of the United States of America, affirm and state as follows:

1. I am the principal of Lemberg Law, LLC. I submit this supplemental declaration in further support of Plaintiff's Motion for Final Approval of the Class Action Settlement and for Approval of petition for fees and costs by Class Counsel.

2. Following the April 2, 2019, Final Approval Hearing we contacted the Settlement Administrator for an updated accounting of the settlement administration costs.

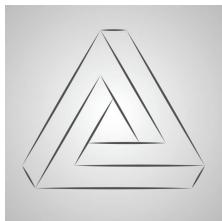
3. The administrator has provided invoices which encompass all its costs in this matter and they are attached as Exhibits A & B hereto with Exhibit A as the invoices themselves and Exhibit B as the summary.

I declare under penalty of perjury that the above is true and correct.

Dated: April 16, 2019

/s/ Sergei Lemberg  
Sergei Lemberg

# **EXHIBIT A**



**Class Experts Group, LLC**  
 740 West Glen Oaks Lane  
 Mequon, WI 53092 US  
 (262) 302-4443  
 info@classexpertsgroup.com  
 classexpertsgroup.com

**BILL TO**

Flagship Credit Acceptance,  
 LLC  
 Ward v. Flagship  
 P.O. Box 965  
 Chadds Ford, PA 19317

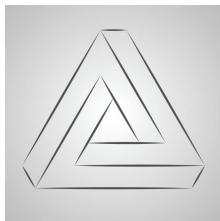
**INVOICE #** 1071  
**DATE** 07/22/2018

**TERMS** Due on receipt

ACTIVITY	QTY	RATE	AMOUNT
<b>Charges</b>			
<b>Data Append Process</b> Reverse historical lookup of names and addresses	90,000	0.169	15,210.00
<b>Print &amp; Mail Postcards</b> Notice	90,000	0.098	8,820.00
<b>Data Append Process</b> National Change of Address	1	750.00	750.00
<b>Postage</b> Presorted, First-Class Mail	90,000	0.26	23,400.00
<b>PO Box</b>	1	960.00	960.00
<b>Account Executive</b>	3.25	275.00	893.75

PAID

WIRING INSTRUCTIONS	SUBTOTAL	50,033.75
Routing Number: 121000248	DISCOUNT	-33.75
Bank: Wells Fargo Bank	TOTAL	50,000.00
Location: San Francisco, CA	BALANCE DUE	
Account Number: 3228219659		<b>\$0.00</b>
Account Title: Class Experts Group		



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 Lemberg Law  
 43 Danbury Road  
 Wilton, CT 06897

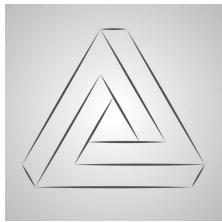
**INVOICE #** 1125  
**DATE** 11/23/2018

**TERMS** Due on receipt

DATE	ACCOUNT SUMMARY	AMOUNT
07/22/2018	Balance Forward	\$50,000.00
11/23/2018	Payments and credits already applied to this invoice	-72,183.00
	Other payments and credits between 07/22/2018 and 11/23/2018	-50,000.00
	New charges (details below)	72,183.00
	<b>Total Amount Due</b>	<b>\$0.00</b>

ACTIVITY	QTY	RATE	AMOUNT
<b>Charges</b>			
<b>Data Append Process</b>	20,000	0.199	3,980.00
Reverse historical lookup of names and addresses			
<b>Print &amp; Mail Postcards</b>	329,000	0.097	31,913.00
Notice			
<b>Data Append Process</b>	1	750.00	750.00
National Change of Address			
<b>Postage</b>	329,000	0.26	85,540.00
Presorted, First-Class Mail			

<b>WIRING INSTRUCTIONS</b>	<b>SUBTOTAL</b>	122,183.00
Routing Number: 121000248	<b>DISCOUNT</b>	-50,000.00
Bank: Wells Fargo Bank	<b>TOTAL</b>	72,183.00
Location: San Francisco, CA	<b>TOTAL OF NEW</b>	72,183.00
Account Number: 3228219659	<b>CHARGES</b>	
Account Title: Class Experts Group	<b>BALANCE DUE</b>	<b>\$0.00</b>



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 Lemberg Law  
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**INVOICE #** 1152  
**DATE** 01/21/2019

**TERMS** Net 15

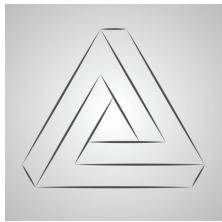
**BILL FOR**

11/19/2018 - 01/18/2019

DATE	ACCOUNT SUMMARY	AMOUNT
11/23/2018	Balance Forward	\$72,183.00
	Payments and credits between 11/23/2018 and 01/21/2019	-72,183.00
	New charges (details below)	16,266.51
	<b>Total Amount Due</b>	<b>\$16,266.51</b>

ACTIVITY	QTY	RATE	AMOUNT
<b>Charges</b>			
<b>Data Append Process</b>	-16,362	0.199	-3,256.04
Reverse historical lookup of names and addresses adjustment from Invoice 1125 (3,638 addresses looked up)			
<b>Data Append Process</b>	5,996	0.199	1,193.20
Secondary reverse historical lookup of names and addresses			
<b>Print &amp; Mail Postcards</b>	-8,072	0.097	-782.98
Adjustment from Invoice 1125 (320,928 printed)			
<b>Print &amp; Mail Postcards</b>	5,996	0.45	2,698.20
Secondary mailing			
<b>Data Append Process</b>	1	750.00	750.00
Secondary mailing NCOA			
<b>Postage</b>	-1	546.91	-546.91
Adjustment from Invoice 1125			
<b>Postage</b>	5,996	0.28	1,678.88
Secondary mailing			
<b>PO Box</b>	2	960.00	1,920.00
<b>Return Mail Processing</b>	1	900.00	900.00
Setup			
<b>Return Mail Processing</b>	22,410	0.45	10,084.50
<b>Website Initial Setup</b>	1	2,500.00	2,500.00
<b>Website Monthly Maintenance</b>	2	150.00	300.00

ACTIVITY	QTY	RATE	AMOUNT
Call Center Initial Setup	1	2,500.00	2,500.00
Call Center Monthly Maintenance	2	180.00	360.00
Call Center IVR	39.50	70.00	2,765.00
Call Center Operator	31.75	110.00	3,492.50
Claims Processing Setup	1	2,500.00	2,500.00
Claims Processing	86,578	0.50	43,289.00
Account Executive	41	175.00	7,175.00
Case Manager	30.75	160.00	4,920.00
Clerical Service	5	75.00	375.00
QA/QC	5	95.00	475.00
<b>Miscellaneous Expenses</b>	1	9.16	9.16
Domain Name Registration			
<b>Miscellaneous Expenses</b>	1	650.00	650.00
Website Security Certificate			
<b>CAFA Notice</b>	1	2,500.00	2,500.00
<hr/>			
<b>WIRING INSTRUCTIONS</b>	SUBTOTAL		88,449.51
Routing Number: 121000248	DISCOUNT		-72,183.00
Bank: Wells Fargo Bank	TOTAL		16,266.51
Location: San Francisco, CA	TOTAL OF NEW		16,266.51
Account Number: 3228219659	CHARGES		
Account Title: Class Experts Group	BALANCE DUE		<b>\$16,266.51</b>



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 Lemberg Law  
 43 Danbury Road  
 Wilton, CT 06897

**INVOICE #** 1164  
**DATE** 02/19/2019

**TERMS** Net 60

**BILL FOR**

1/19/2019 - 2/18/2019

DATE	ACCOUNT SUMMARY	AMOUNT
01/21/2019	Balance Forward	\$16,266.51
	Payments and credits between 01/21/2019 and 02/19/2019	0.00
	New charges (details below)	14,351.48
	<b>Total Amount Due</b>	<b>\$30,617.99</b>

ACTIVITY	QTY	RATE	AMOUNT
<b>Charges</b>			
Return Mail Processing	9,442	0.45	4,248.90
Data Append Process	30,770	0.13	4,000.10
Advanced Best Address lookup			
Data Append Process	1	750.00	750.00
NCOA			
Return Mail Remail	23,662	0.45	10,647.90
Postage	1	6,336.08	6,336.08
Website Monthly Maintenance	1	150.00	150.00
Call Center Monthly Maintenance	1	180.00	180.00
Call Center IVR	46.25	70.00	3,237.50
Call Center Operator	39	110.00	4,290.00
Claims Processing	17,662	0.50	8,831.00
Banking QSF Setup	1	1,800.00	1,800.00
Account Executive	33	175.00	5,775.00
Case Manager	65	160.00	10,400.00
Clerical Service	38	75.00	2,850.00
QA/QC	9	95.00	855.00

WIRING INSTRUCTIONS

Routing Number: 121000248

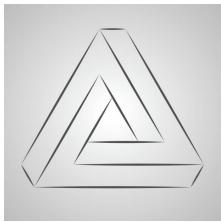
Bank: Wells Fargo Bank

Location: San Francisco, CA

Account Number: 3228219659

Account Title: Class Experts Group

SUBTOTAL	64,351.48
DISCOUNT	-50,000.00
TOTAL	14,351.48
TOTAL OF NEW	14,351.48
CHARGES	
BALANCE DUE	<b>\$30,617.99</b>



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**BILL TO**

Ward v. Flagship  
 Lemberg Law  
 43 Danbury Road  
 Wilton, CT 06897

**INVOICE #** 1176  
**DATE** 03/23/2019

**TERMS** Net 15

**BILL FOR**

02/19/2019 - 03/18/2019

DATE	ACCOUNT SUMMARY	AMOUNT
02/19/2019	Balance Forward	\$30,617.99
	Payments and credits between 02/19/2019 and 03/23/2019	0.00
	New charges (details below)	26,313.00
	<b>Total Amount Due</b>	<b>\$56,930.99</b>

ACTIVITY	QTY	RATE	AMOUNT
<b>Charges</b>			
Return Mail Remail	3,625	0.45	1,631.25
Data Append Process	4,115	0.13	534.95
Advanced Address Update			
Return Mail Remail	44	0.45	19.80
Postage	44	0.50	22.00
Website Monthly Maintenance	1	150.00	150.00
Call Center Monthly Maintenance	1	180.00	180.00
Call Center IVR	48.15	70.00	3,370.50
Call Center Operator	54.75	110.00	6,022.50
Claims Processing	14,684	0.50	7,342.00
Tax Services QSF	1	2,800.00	2,800.00
Account Executive	14	175.00	2,450.00
Case Manager	8	160.00	1,280.00
Clerical Service	3	75.00	225.00
QA/QC	3	95.00	285.00

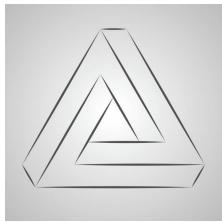
**WIRING INSTRUCTIONS**  
 Routing Number: 121000248  
 Bank: Wells Fargo Bank

**TOTAL OF NEW CHARGES** 26,313.00

Location: San Francisco, CA  
Account Number: 3228219659  
Account Title: Class Experts Group

BALANCE DUE

**\$56,930.99**



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**BILL TO**

Ward v. Flagship  
 Lemberg Law  
 43 Danbury Road  
 Wilton, CT 06897

**INVOICE #** 1177  
**DATE** 04/05/2019

**TERMS** Net 15

**BILL FOR**

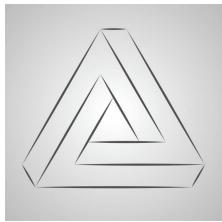
Final Invoice

DATE	ACCOUNT SUMMARY	AMOUNT
03/23/2019	Balance Forward	\$56,930.99
	Payments and credits between 03/23/2019 and 04/05/2019	0.00
	New charges (details below)	103,279.01
	<b>Total Amount Due</b>	<b>\$160,210.00</b>

ACTIVITY	QTY	RATE	AMOUNT
<b>Charges</b>			
<b>Website Monthly Maintenance</b>	8	150.00	1,200.00
<b>Call Center Monthly Maintenance</b>	8	180.00	1,440.00
<b>Call Center IVR</b>	385	70.00	26,950.00
<b>Call Center Operator</b>	438	110.00	48,180.00
<b>Claims Processing</b>	1,076	0.50	538.00
<b>Print &amp; Mail Checks</b>	67,255	0.59	39,680.45
<b>Data Append Process</b>	3	500.00	1,500.00
<b>NCOA</b>			
<b>Postage</b>	67,255	0.48	32,282.40
Checks			
<b>Return Check Processing</b>	12,000	0.75	9,000.00
<b>Print &amp; Mail Checks</b>	10,000	1.15	11,500.00
Check Remail			
<b>Postage</b>	10,000	0.48	4,800.00
Check Remail			
<b>Banking Services</b>	8	150.00	1,200.00
<b>Banking Services</b>	67,255	0.10	6,725.50
Check Clearing			
<b>Miscellaneous Expenses</b>	1	5,000.00	5,000.00
<b>Account Executive</b>	40	175.00	7,000.00

ACTIVITY	QTY	RATE	AMOUNT
Case Manager	35	160.00	5,600.00
Clerical Service	25	75.00	1,875.00
QA/QC	15	95.00	1,425.00
 WIRING INSTRUCTIONS	 SUBTOTAL	 205,896.35	
Routing Number: 121000248	DISCOUNT	-102,617.34	
Bank: Wells Fargo Bank	TOTAL	103,279.01	
Location: San Francisco, CA	TOTAL OF NEW	103,279.01	
Account Number: 3228219659	CHARGES		
Account Title: Class Experts Group	BALANCE DUE		<b>\$160,210.00</b>

# **EXHIBIT B**



**Class Experts Group, LLC**  
 740 West Glen Oaks Lane  
 Mequon, WI 53092 US  
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## Statement

### TO

Ward v. Flagship  
 Lemberg Law  
 43 Danbury Road  
 Wilton, CT 06897

**STATEMENT NO. 1018**

**DATE 06/01/2019**

DATE	ACTIVITY	AMOUNT	RECEIVED
07/22/2018	Invoice #1071	50,000.00	50,000.00
11/23/2018	Invoice #1125	72,183.00	72,183.00
01/21/2019	Invoice #1152	16,266.51	0.00
02/19/2019	Invoice #1164	14,351.48	0.00
03/23/2019	Invoice #1176	26,313.00	0.00
04/05/2019	Invoice #1177	103,279.01	0.00
		<b>TOTAL AMOUNT</b>	<b>TOTAL RECEIVED</b>
		\$282,393.00	\$122,183.00